

**TROY LAW, PLLC**

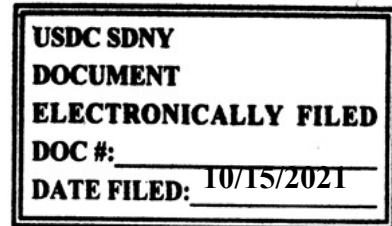
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October 14, 2021

**Via ECF**

Hon. Katherine H. Parker U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007



**MEMO ENDORSED**

**Re: Joint Letter Requesting for In Person Conference on October 21, 2021 be converted to a Telephone Conference**  
*Bello Herrera et al. v. Manna 2<sup>nd</sup> Avenue LLC et al.*, No. 20-cv-11026 (GHW) (KHP), (E.D.N.Y.)

Your Honor,

This office represents the Plaintiff in the above-referenced matter. We write respectfully and with Defendant's consent, in regards to Your Honors Order dated September 24, 2021, stating that the parties are to have an Initial Case Management Conference on October 21, 2021 in person. *See* Dkt No. 43. Plaintiffs respectfully request that the conference that is to be in person on October 21, 2021 be converted to a telephone conference on October 21, 2021 at the same time. This is plaintiffs first request and granting such request will not prejudice any party in the action.

Plaintiffs request that the Initial Case Management Conference be converted to a telephone conference because both attorneys at the undersigns firm will be in and out of pre-scheduled commitments all day. One of Plaintiffs' attorneys at the undersigned office will be attending a deposition starting at 10:00 am that will most likely last the whole day. The other attorney at the undersigned office is scheduled to take a bankruptcy court matter at 10:30 am and also is scheduled to take another conference for another case at 1:00 pm. With both attorneys needing to attend pre-scheduled conferences and a deposition, Plaintiffs' counsel will not have enough time to travel to court and from the court to attend Your Honors conference due to tight scheduling. Plaintiff does not want to short change any of the conference scheduled for that day and for that reason request that this conference be converted to a telephone conference to give Plaintiffs' counsel enough time to move through each conference. Such request will not prejudice any party in the matter due to both sets of Defendants consenting to the request.

For the reasons stated above, plaintiff request that the conference scheduled for October 21, 2021 be converted from an in-person conference to a telephone conference.

We thank the court for their consideration in the matter and apologies for inconveniencing the court.

**APPLICATION GRANTED: The Initial Case Management Conference in this matter scheduled for Thursday, October 21, 2021, at 11:30 a.m. is hereby converted to a telephonic conference. Counsel for the parties are directed to call Judge Parker's AT&T conference line at the scheduled time. Please dial (866) 434-5269; access code 4858267.**

**APPLICATION GRANTED**

*Katharine H. Parker*

**Hon. Katharine H. Parker, U.S.M.J.**

**10/15/2021**

Hon. Ona T. Wong U.S.D.J.

October 14, 2021

*Bello-Herrera et al. v. Manna 2nd Avenue LLC et al.*, No. 20-cv-00640 (GHW) (OTW),  
(E.D.N.Y.)

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Respectfully submitted,  
TROY LAW, PLLC

/s/ John Troy

John Troy

*Attorney for Plaintiffs*

cc: via ECF  
all counsel of record

JT/gd